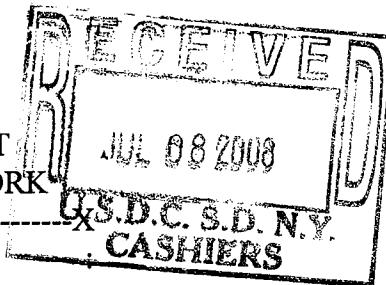


JUDGE CASTEL

COWAN, LIEBOWITZ & LATMAN, P.C.
1133 Avenue of the Americas
New York, NY 10036
(212) 790-9266
Robert W. Clarida (RC-3190)
Attorneys for Plaintiff

08 CIV 6195

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK



The Institute for the Development of Earth Awareness.

Plaintiff: : 08 Civ.

-against-

**COMPLAINT FOR COPYRIGHT
INFRINGEMENT**

People for the Ethical Treatment of Animals, :

JURY TRIAL DEMANDED

Defendant.

-x

Plaintiff, by its attorneys, Cowan, Liebowitz & Latman, P.C., for its complaint against defendant, alleges as follows:

NATURE OF THE ACTION

1. This is an action for copyright infringement. Plaintiff's principal, Marjorie Spiegel, is a respected independent scholar and the author of an illustrated literary work entitled "The Dreaded Comparison: Human and Animal Slavery." Plaintiff and Spiegel own a registered copyright in the work. Defendant, without plaintiff's authorization, has prepared, reproduced and distributed a wide variety of printed and electronic materials for purposes including promotion and fund-raising which are copied from and substantially similar to protectible elements of plaintiff's work. Plaintiff seeks a permanent injunction, monetary damages, and attorneys fees.

PARTIES

2. Plaintiff The Institute for the Development of Earth Awareness (hereinafter "IDEA") is an all-volunteer New York not-for-profit, 501(c)(3) corporation having an address at PO Box 124 Prince Street Station, New York, NY 10012, which is engaged in, among other things, creating, publishing and distributing educational and scholarly publications concerning social, environmental and animal rights issues.

3. Upon information and belief, defendant People for the Ethical Treatment of Animals (hereinafter "PETA") is a Virginia not-for-profit 501(c)(3) corporation having an office at 501 Front Street, Norfolk, Virginia, 23510, with annual revenues of more than \$30 million, which is engaged in, among other things, a wide variety of activities concerning animal rights issues.

4. Upon information and belief, PETA employs an agent in this state and this judicial district, transacts business in this state and this judicial district, operates an interactive internet site which is accessible in this state and this judicial district, has engaged in infringing activities that injure plaintiff in this state and this judicial district, or is otherwise subject to personal jurisdiction in this state and this district, and a substantial part of the events giving rise to this claim occurred in this state and this judicial district.

JURISDICTION

5. This is a civil action for copyright infringement arising under the copyright laws of the United States, 17 U.S.C. § 101 et seq. (hereinafter the "Copyright Act"). Jurisdiction is based on 28 U.S.C. §§ 1331 and 1338(a); venue is proper under 28 U.S.C. §§ 1391(b) and 1400(a).

THE WORK

6. Not later than 1988, IDEA's co-founder Marjorie Spiegel authored an illustrated literary work entitled "The Dreaded Comparison: Human and Animal Slavery" (hereinafter "the Work"). A second edition of the Work was published in 1989, and the current, revised and expanded edition was published in 1996. The Work is still in print and commercially available.

7. The Work includes original textual matter authored by Marjorie Spiegel, a number of illustrations and photographs that were creatively selected, coordinated and arranged by Marjorie Spiegel, quotations from historical and contemporary sources that were creatively selected, coordinated and arranged by Marjorie Spiegel, and a foreword by noted author Alice Walker, which Ms. Walker wrote expressly for the Work.

8. IDEA, through its division Mirror Books, is an owner of copyright in the Work including the text, foreword, and selection and arrangement of photographs, illustrations and quotes, all of which are original creations and constitute copyrightable subject matter under the Copyright Act.

9. IDEA has duly complied with all relevant requirements of the Copyright Act with respect to the Work, has registered its copyright in such work in the United States Copyright Office, and obtained registration certificate TX 6-393-393 as to the Work. (A copy of the copyright registration certificate for the Work is annexed hereto as Exhibit A).

10. The Work has been recognized by critics and scholars as a seminal, original and influential contribution to the subject and field of animal rights. Examples of such recognition include the following:

- "*The Dreaded Comparison* is . . . widely considered to be one of the foundational texts of the animal-rights movement." – David Wolfson, Esq., Animal Law

instructor and lecturer at Harvard Law School, Yale Law School, NYU Law School, Columbia University Law School; Animal Law attorney and scholar.

- “I think this book rates as one of the top ten books in the general area of human-animal studies. For these reasons, Marjorie Spiegel’s volume will continue to have a major place in law school education.” – Prof. Paul Waldau, First Barker Lecturer of Animal Law at Harvard Law School, Director of the Center for Animals and Public Policy at Tufts University’s Cummings School of Veterinary Medicine; Vice-Chair of the American Bar Association’s Animal Law Committee.
- "Using considerable scholarship, (Spiegel) makes a strong case for links between white oppression of black slaves and human oppression of animals. . . Chilling yet enlightening, this provocative book is vitally important to our efforts to understand the roots of individual and societal violence. It belongs in all libraries." – Library Journal (starred review).
- “An extremely important book – honest and fearless . . . Marjorie Spiegel has said the single most important thing there is to say about animals. I love this book.”
– Elizabeth Marshall Thomas, anthropologist and New York Times best-selling author.
- “Provocatively presents the first in-depth exploration of the similarities between the violence humans have wrought against other humans, and our culture’s treatment of non-human animals. Marjorie Spiegel’s examination of power and the source of oppressive behavior is essential reading . . . *The Dreaded Comparison* is a highly original book which is at once chilling and enlightening, and vitally important.”
– The Midwest Book Review (“Reviewer’s Choice”).
- "In *The Dreaded Comparison* Marjorie Spiegel imaginatively shows that animals are still being exploited and tortured like slaves. By developing this parallel, she has written a deeply provocative and disturbing book." – David Brion Davis, Sterling Professor of History, Yale University.

11. One of the specific original, expressive and creative elements of the Work singled out repeatedly by critics is its striking selection and arrangement of quotations, photographs and illustrations. Examples of such recognition include the following:

- “[An] invaluable contribution. . . Marjorie Spiegel’s extraordinary book, *The Dreaded Comparison*, with its judiciously chosen quotations and stunningly juxtaposed illustrations . . . packs a huge punch.” – The Boston Book Review.
- “I was heavily influenced by Marjorie Spiegel’s powerful tour de force, *The*

Dreaded Comparison, in which she parallels, in words, drawings, diagrams, and photographs, the devastating similarities between human and animal slavery."

— William M. Kunstler, Esq., noted civil rights attorney, co-founder of The Center for Constitutional Rights.

- "This radical little book dares to draw parallels between white oppression of black slaves and human oppression of nonhuman animals. Juxtapositions of racism with speciesism are graphic; an engraving of a white master whipping a bound black slave sits beside a photograph of a man clubbing a harp seal. Spiegel's verbal comparisons are just as powerful, so clearly drawn that the readers' comfortable anthropocentric worldview tips askew." — Wilson Library Bulletin (April 1990).
- "*The Dreaded Comparison* is exactly that — a shocking comparison between the historical enslavement of black people in the United States and the enslavement of animals. Author Marjorie Spiegel uses quotes, illustrations and photos, as well as her own compelling words, to portray the distressing similarities between racism and speciesism . . . The likeness between the enslavement of blacks and the enslavement of animals is made most clear in side-by-side illustrations. A 1788 illustration of a slave ship picturing severely cramped quarters — so cramped that the slaves would have difficulty turning or moving — is shown next to a photo of thousands of cattle herding up a narrow ramp onto a ship that will take them to market. A 1933 photo . . ." — Vegetarian Times.
- "Nevertheless, the comparisons can be made, and Spiegel makes them in a powerful and unsettling way. Pictures relating to race slavery — archival photos, cartoons, and newspaper clippings — are juxtaposed to ones relating to what happens now to nonhuman animals." — The Animals' Agenda.
- "*The Dreaded Comparison* . . .'will take a lifetime to forget,' as Alice Walker comments in her preface. For one thing, the illustrations in this book, gathered from a diverse assortment of archives and private collections, have a visual impact that makes the connection between human and animal enslavement immediately clear. Images that haunt me . . . A cattle-branding scene is opposite a painting of slavetraders carving brand names into the backs of their human merchandise." — New Directions for Women.
- "Another passionate book, and one that draws an apt parallel, is *The Dreaded Comparison: Human and Animal Slavery* by Marjorie Spiegel. With strikingly paired illustrations and many juxtaposed historical quotations, the author shows the oppression, torture, and enslavement of both blacks and animals have been justified in almost the same words and originate in the same dark places of the human psyche." — Wilson Library Bulletin (May 1990).
- "Spiegel sets pictures, quotes and descriptions side by side to establish some eerie

parallels: both blacks and animals have been whipped, bound, gagged, branded, bred, sold, force-fed, transported under lethal conditions and used as subjects for scientific experiments." – The Women's Review of Books.

12. The Work has also been widely recognized for its pioneering selection of topics, identifying specific parallels between the historical institution of slavery and present-day treatment of non-human animals, including their branding and beating, their sale at auctions, and their use in scientific experiments. Examples of such recognition include the following:

- "We experience a healthy discomfort as Spiegel makes us aware of the parallels in the abuse and suffering experienced by black people and non-human animals. Both have been forced to subordinate their own wills to that of a master, both have been branded, hunted, separated from loved ones . . . Both have even been subjects of scientific study without their consent." – MultiCultural Review ("Dedicated to a better understanding of ethnic, racial and religious diversity").
- "Marjorie Spiegel . . . bring[s] home our involvement in both human and animal slavery and . . . [makes] a strong case, backed by considerable scholarship, for a meaningful comparison between the two . . . The book . . . draw[s] comparisons between what happened to black slaves not so long ago and what happens to animals now: the brandings and auctions, the hideous means of transport that many did not survive, the tearing of offspring from their mothers, the beatings, tetherings and overworking." – New Scientist.
- "[Spiegel's] comparisons include the brandings and auctions of both slaves and animals, the hideous means of transport (slave ships, truckloads of cattle), and the tearing of offspring from their mothers. Her illustrative juxtapositions are graphic, e.g., a photograph of a chimpanzee in a syphilis experiment beside a photo of a black man in the Tuskegee Syphilis Study." – Library Journal (starred review).

DEFENDANT'S COPYRIGHT INFRINGEMENT

13. Plaintiff repeats and realleges the allegations contained above in paragraphs 1 through 12 as if fully set forth herein.

14. Upon information and belief, PETA has had access to the Work since at least 1988, and PETA reviewed the Work in a PETA publication at or about that time.

15. Subsequently, PETA and IDEA were also engaged in negotiations regarding PETA's proposal to reprint excerpts from the Work, and PETA's separate proposal to obtain multiple copies of the Work or to reprint and distribute copies of the Work in its entirety. No agreement was reached as a result of these negotiations.

16. Upon information and belief, since at least 2005 and continuing to the present, PETA has, without authorization from or attribution to IDEA, prepared, reproduced, distributed and publicly displayed certain textual and graphic materials (the "Infringing Materials") that are copied from and substantially similar to protectible elements of the Work, including the Work's text, selection and arrangement of images, selection and arrangement of quotations, and selection and arrangement of topics.

17. Upon information and belief, the Infringing Materials have been used and exploited by PETA, *inter alia*, in a media campaign entitled the "Animal Liberation Project," which includes a nationally touring exhibit entitled "Are Animals the New Slaves?"; in electronic versions as features of websites under PETA's control, including its primary website at www.peta.org; in printed brochures and promotional materials; and in connection with fund-raising solicitations and activities.

18. The Infringing Materials also make extensive and unauthorized use of an Alice Walker quotation from the foreword of the Work, both in connection with the "Animal Liberation Project," "Are Animals the New Slaves?", and in connection with other unrelated activities by PETA, including advertising and fund-raising solicitations.

19. Upon information and belief, PETA continues to prepare, reproduce, distribute, publicly display and exploit the above-described Infringing Materials, both in tangible copies and

on internet websites under PETA's control, including the current website at www.peta2.com, and to exploit and make other uses of the Infringing Materials, without authorization from or attribution to IDEA.

20. Upon information and belief, the similarities of original, expressive authorship which permeate the works at issue are neither fortuitous nor de minimis.

21. Through such activities described above, PETA has infringed and, upon information and belief, is continuing to infringe upon IDEA's registered copyright in the Work.

AS TO ALL ALLEGATIONS

22. Upon information and belief, PETA's acts complained of herein are willful. Plaintiff objected in writing to PETA's use of the Infringing Materials not later than August 31, 2005, and has communicated its continuing objection to PETA's use of the Infringing Materials since that time, but PETA has continued to reproduce, distribute and display the Infringing Materials, and to create new Infringing Materials despite plaintiff's objections.

23. Upon information and belief, by the acts complained of, including without limitation the use of the Infringing Materials in connection with promotion and fund-raising activities, PETA has made substantial profits and gains to which it is not in law or in equity entitled.

24. Upon information and belief, PETA intends to and will continue to expand the acts complained of herein, unless restrained by this Court.

25. The aforementioned acts of PETA have damaged and will continue to damage IDEA and cause it irreparable harm, and IDEA has no adequate remedy at law.

26. Moreover, PETA's activities complained of herein have been denounced on the

grounds of racism and insensitivity by a number of prominent scholars and activists including Dr. James Cameron, Founder of America's Black Holocaust Museum; Vakiya Courtney, Executive Director of America's Black Holocaust Museum; Mark Potok, Director of the Southern Poverty Law Center's Intelligence Project; John C. White, NAACP Director of Communications; Scott X. Esdaile, President of the Greater New Haven NAACP; and James Griffin, President of the Greater Waterbury NAACP and member of the Connecticut Commission on Human Rights and Opportunities.

27. The above-referenced denunciations of the Infringing Materials demonstrate the broad negative response and ill-will PETA's infringing acts have generated, particularly among those active in civil rights causes.

28. Plaintiff encountered no such negative reaction to the Work or its controversial topic, in the civil rights community or elsewhere, and to the contrary the Work was praised by leading civil rights advocates such as Alice Walker, Gordon Parks, William Kunstler and Sen. Tom Hayden, and positively reviewed by prominent publications in the field including Ebony Man and MultiCultural Review. Examples of such recognition include:

- “It may surprise some of my readers that, given my background in the field of human rights, I have taken the time to write about cruelty to non-human animals when there was so much indifference to that practiced by humans against each other. Indeed, I gave considerable thought about whether it was appropriate for me to do so. In the end, however, I resolved all of my doubts in favor of writing this article . . . [and] in reaching this conclusion, I was heavily influenced by Marjorie Spiegel's powerful tour de force, *The Dreaded Comparison*.” – William M. Kunstler, Esq., noted civil rights attorney, co-founder of The Center for Constitutional Rights.
- “*The Dreaded Comparison* should be placed in schoolrooms across the universe.” – Gordon Parks, author and photographer.
- “This powerful book, once read with comprehension, will take a lifetime to forget.

. . . It is the author's clarity that produces hope. Her scholarship. Her assuredness in pointing out the 'dreaded comparison' between the pain felt by humans who are abused and the pain felt by non-human animals who are abused, recognizing it as the same pain. The animals of the world exist for their own reasons. They were not made for humans any more than black people were made for whites or women for men. This is the essence of Ms. Spiegel's cogent, humane and astute argument, and it is sound." – Alice Walker, author (from the foreword to the Work).

- "We know that slaves have been treated like animals; Spiegel asks us to consider why we treat animals like slaves." – Tom Hayden, former California state senator.
- "Spiegel's book is a powerful and important statement . . . The book explores and compares the historical dominion of whites over blacks, and of human over non-human animals . . . This work . . . would be suitable for college courses at any level in sociology, philosophy, or peace studies. It could also be used in any course examining issues of oppression in contemporary animal issues." – MultiCultural Review ("Dedicated to a better understanding of ethnic, racial and religious diversity").
- "The book, which draws uncanny parallels between the institution of American slavery in the antebellum United States, and the oppression weathered by domestic animals today, has at once been made required reading at colleges and universities nationwide, while being met with critical acclaim by reviewers on three continents – among them renowned Black authors Alice Walker and Gordon Parks." – Ebony Man (featured book).

29. Readers encountering the Work for the first time will henceforth be forced to view it through the distorted prism that PETA has created, rather than on its own merits. The Infringing Materials thus degrade and impair public discourse, to IDEA's detriment. Such harm to IDEA is not compensable by monetary damages.

WHEREFORE, IDEA demands:

A. That defendant, its agents, officers, servants, employees, successors and/or assigns, and all persons or companies in active concert and/or participation with them, be permanently enjoined from reproducing, making, reprinting, publishing, displaying, manufacturing, selling, offering for sale, promoting, advertising, distributing and/or commercially exploiting in any

manner, either directly or indirectly, the Infringing Materials or other works which incorporate the original, protectible expression of the Work, or works substantially similar thereto;

B. That IDEA be entitled to recover:

(1) (a) all damages suffered by IDEA as a result of defendant's infringing acts, and (b) all profits derived from defendant's wrongful acts in an amount to be determined at the trial of this action; or

(2) in lieu of such damages and profits, where applicable and should IDEA so elect, an award of statutory damages with respect to each infringement as provided by 17 U.S.C. § 504(c);

C. That defendant be directed to deliver to IDEA for destruction all books, publications, brochures, graphics, exhibits, displays, catalogues, means of manufacture and/or other materials in defendant's possession or control, which, if sold, distributed or used in any way would violate paragraph A above; and

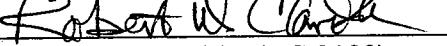
D. That IDEA recover from defendant all costs incurred in this action, including the reasonable attorney's fees incurred in connection with IDEA's claim of copyright infringement with respect to the Work, together with such other and further relief as this Court may deem just and proper.

Dated: New York, New York
July 8, 2008

COWAN, LIEBOWITZ & LATMAN, P.C.

Attorneys for Plaintiff The Institute for
the Development of Earth Awareness

By:


Robert W. Clarida (RC 3190)

1133 Avenue of the Americas
New York, New York 10036-6799
(212) 790-9200

EXHIBIT A

(Copyright Registration Certificate)

Certificate of Registration



This Certificate issued under the seal of the Copyright Office in accordance with title 17, United States Code, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

Marybeth Peters

Register of Copyrights, United States of America



Form TX

For a Nondramatic Literary Work
UNITED STATES COPYRIGHT OFFICE

REGI

TX 6-393-393



EFFECTIVE DATE OF REGISTRATION

5 19 06
Month Day Year

DO NOT WRITE ABOVE THIS LINE. IF YOU NEED MORE SPACE, USE A SEPARATE CONTINUATION SHEET.

1 TITLE OF THIS WORK ▼

THE DREADED COMPARISON

PREVIOUS OR ALTERNATIVE TITLES ▼

HUMAN AND ANIMAL SLAVERY

(subtitle)

PUBLICATION AS A CONTRIBUTION. If this work was published as a contribution to a periodical, serial, or collection, give information about the collective work in which the contribution appeared. Title of Collective Work ▼

If published in a periodical or serial give: Volume ▼

Number ▼

Issue Date ▼

On Pages ▼

2 NAME OF AUTHOR ▼

a *MARJORIE SPIGEL*

Was this contribution to the work a "work made for hire"?

Yes
 No

AUTHOR'S NATIONALITY OR DOMICILE

Name of Country

OR Citizen of USA
Domiciled in

DATES OF BIRTH AND DEATH
Year Born ▼ Year Died ▼

If the answer to either of these questions is "Yes," see detailed instructions.

WAS THIS AUTHOR'S CONTRIBUTION TO THE WORK

Yes No
 Yes No

Pseudonymous? Yes No

NATURE OF AUTHORSHIP Briefly describe nature of material created by this author in which copyright is claimed.
AUTHORSHIP + COMPILATION OF ENTIRE TEXT / WORK, EXCEPT FOREWORD.

FOREWORD

NAME OF AUTHOR ▼

b *ALICE WALKER*

Was this contribution to the work a "work made for hire"?

Yes
 No

AUTHOR'S NATIONALITY OR DOMICILE

Name of Country

OR Citizen of USA
Domiciled in

DATES OF BIRTH AND DEATH
Year Born ▼ Year Died ▼

If the answer to either of these questions is "Yes," see detailed instructions.

WAS THIS AUTHOR'S CONTRIBUTION TO THE WORK

Yes No
 Yes No

Pseudonymous? Yes No

NATURE OF AUTHORSHIP Briefly describe nature of material created by this author in which copyright is claimed.
FOREWORD

NAME OF AUTHOR ▼

DATES OF BIRTH AND DEATH
Year Born ▼ Year Died ▼

c Was this contribution to the work a "work made for hire"?

Yes
 No

AUTHOR'S NATIONALITY OR DOMICILE

Name of Country

OR Citizen of
Domiciled in

WAS THIS AUTHOR'S CONTRIBUTION TO THE WORK
If the answer to either of these questions is "Yes," see detailed instructions.

DATES OF BIRTH AND DEATH
Year Born ▼ Year Died ▼

Anonymous? Yes No
 Yes No

Pseudonymous? Yes No

NATURE OF AUTHORSHIP Briefly describe nature of material created by this author in which copyright is claimed.

3 YEAR IN WHICH CREATION OF THIS WORK WAS COMPLETED

a *1996* This information must be given even if the claimant is the same as the author given in space 2. ▶ Year in all cases

b DATE AND NATION OF FIRST PUBLICATION OF THIS PARTICULAR WORK

b Complete this information Month *APRIL* Day *21* Year *1997* Nation *USA*

COPYRIGHT CLAIMANT(S) Name and address must be given even if the claimant is the same as the author given in space 2. ▶

MIRROR BOOKS, DIVISION OF IDEA

MARJORIE SPIGEL

*PO Box 124
PRINCE STREET STATION
NEW YORK, NY 10012*

TRANSFER If the claimant(s) named here in space 4 is (are) different from the author(s) named in space 2, give a brief statement of how the claimant(s) obtained ownership of the copyright. ▶

4 WRITTEN AGREEMENT

MORE ON BACK ▶ • Complete all applicable spaces (numbers 5-8) on the reverse side of this page.

• See detailed instructions.

• Sign the form at line 8.

DO NOT WRITE HERE

Page 1 of *2* pages

See instructions before completing this space.

APPLICATION RECEIVED
MAY 19 2006

ONE DEPOSIT RECEIVED

TWO DEPOSITS RECEIVED
MAY 19 2006

FUNDS RECEIVED

DO NOT WRITE HERE
OFFICE USE ONLY

Amended by C.O. from phone call to Marjorie Spiegel on August 1, 2006.

EXAMINED BY

FORM TX

CHECKED BY

 CORRESPONDENCE YesFOR
COPYRIGHT
OFFICE
USE
ONLY

DO NOT WRITE ABOVE THIS LINE. IF YOU NEED MORE SPACE, USE A SEPARATE CONTINUATION SHEET.

PREVIOUS REGISTRATION Has registration for this work, or for an earlier version of this work, already been made in the Copyright Office?

 Yes No If your answer is "Yes," why is another registration being sought? (Check appropriate box.) ▼

- a. This is the first published edition of a work previously registered in unpublished form.
- b. This is the first application submitted by this author as copyright claimant.
- c. This is a changed version of the work, as shown by space 6 on this application.

If your answer is "Yes," give: Previous Registration Number ►

Year of Registration ►

5

DERIVATIVE WORK OR COMPILATION

Preexisting Material Identify any preexisting work or works that this work is based on or incorporates. ▼

TWO PRIOR EDITIONS OF SAME TITLE: 1988; 1989.

a 6

See instructions
before completing
this space.

Material Added to This Work Give a brief, general statement of the material that has been added to this work and in which copyright is claimed. ▼

**EDITORIAL REVISIONS; ADDITIONS TO TEXT; ADDITIONAL ILLUSTRATIONS;
ADDENDA, AFTERWORD, INDEX, AND OTHER SUPPLEMENTAL MATERIAL;
ALL COMPRISING THIS "REVISED AND EXPANDED EDITION"**

DEPOSIT ACCOUNT If the registration fee is to be charged to a Deposit Account established in the Copyright Office, give name and number of Account.
Name ▼ Account Number ▼

a 7

CORRESPONDENCE Give name and address to which correspondence about this application should be sent. Name/Address/Apt/City/State/ZIP ▼

MARJORIE SPIEGEL
EXECUTIVE DIRECTOR
MIRROR BOOKS / IDEA
PO BOX 124 Fax number ▼
PRINCE STREET STATION
NEW YORK, NY 10012

b

Area code and daytime telephone number ► 212 741 0338
Email ► idea09@earthlink.net

CERTIFICATION I, the undersigned, hereby certify that I am the
Check only one ▶

of the work identified in this application and that the statements made
by me in this application are correct to the best of my knowledge.

{ is author

- other copyright claimant
- owner of exclusive right(s)
- authorized agent of

Name of author or other copyright claimant, or owner of exclusive right(s) ▲

Typed or printed name and date ▼ If this application gives a date of publication in space 3, do not sign and submit it before that date.

MARJORIE SPIEGELDate ► **12 May 2006**

8

Handwritten signature (X) ▼

X

Certificate will be mailed in window envelope to this address:

Name ▼

MARJORIE SPIEGEL, c/o IDEA

Number/Street/Apt ▼

P.O. Box 124, PRINCE STREET STATION

City/State/ZIP ▼

NEW YORK, NY 10012

YOU MUST:

- Complete all necessary spaces
- Sign your application in space 8

SEND ALL 3 ELEMENTS

IN THE SAME PACKAGE

1. Application form
2. Nonrefundable filing fee in check or money order payable to Register of Copyrights
3. Deposit material

MAIL TO:

Library of Congress
Copyright Office - TX
101 Independence Avenue, S.E.
Washington, D.C. 20550-0222

9

17 U.S.C. § 506(e); Any person who knowingly makes a false representation of a material fact in the application for copyright registration provided for by section 409, or in any written statement filed in connection with the application, shall be fined not more than \$2,500.

Form 1050
Copyright Office
U.S. Library of Congress
Washington, D.C. 20550-0222
(202) 707-3300